

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION AT MEMPHIS**

MICHAEL E. DICKERSON,

Plaintiff,

v.

No. 2:19-cv-02589-SHL-cgc

ISS FACILITY SERVICES, INC.,

Defendants.

**PLAINTIFF'S NOTICE TO TAKE RULE 30(b)(6) AUDIO-VISUAL DEPOSITION OF
ISS FACILITY SERVICES, INC.**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Counsel for the Plaintiff shall take the audio-visual deposition of the designated agent or agents of the defendant, **ISS FACILITY SERVICES, INC.**, who shall be prepared to testify about the following matters:

1. Any and all facts pertaining to how the subject incident occurred;
2. The identity of any persons with knowledge of the events leading up to the subject incident, during the subject incident, and after the subject incident, including the specific information known by each person;
3. General background information regarding the corporation including but not limited to, its disciplinary policies and practices, employee expectations and protocols, training procedures, maintenance procedures, positions and employees within the company, chain of command, human resources functions, personnel department functions, filing systems, document retention policies, employee handbook information, general policies and procedures, safety standards, persons in charge of implementing safety standards, federal, state and local safety regulations and statutes;

4. Information regarding the defendant corporation's training policies and procedures for its employees;
5. Information contained in the personnel/employment files for those employees disclosed by defendant corporation in its Rule 26(a) disclosures and/or discovery responses;
6. Prior and subsequent accident history involving employees and/or independent contractors of the defendant corporation while such employees and/or independent contractors were acting in the course and scope of employment of defendant corporation (or on or about business of defendant corporation) for the five years immediately preceding this accident through the current date;
7. Litigation history of the defendant corporation in cases involving negligence and/or personal injuries within the ten (10) years immediately preceding the subject accident through the current date;
8. A complete description of defendant corporation's business relationship, purposes, practices, policies, procedures responsibilities, and activities with respect to Smith & Nephew; and
9. Elaboration as might be needed regarding defendant corporation's Rule 26(a)(1) disclosures and discovery responses.

Pursuant to Rule 30(b)(6), you are required to designate **one or more** persons to testify concerning the matters upon which examination is sought, which person or persons shall appear on the date and time and at the place specified herein.

The deposition shall occur on Tuesday, February 9, 2021, beginning at 10:00 a.m. via Zoom video conference, and shall continue from day to day until complete. A simultaneous stenographic record will be made. Said deposition will take place before a Notary Public or some other officer duly authorized to administer oaths.

Respectfully submitted:

/s/Jason J. Yasinsky
Jason J. Yasinsky (#029514)
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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I do hereby certify that the foregoing document a true and complete electronic copy of the same was served upon the following person(s):

WARREN D. McWHIRTER
GEOFFREY GAIA
Attorneys for ISS Facility Services, Inc.
9032 Stone Walk Place
Germantown, Tennessee 38138

/s/Jason J. Yasinsky
JASON J. YASINSKY

On this the 5th day of February, 2021.